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March 26, 2024

**VIA CM/ECF**

Honorable Edward S. Kiel, U.S.D.J.  
Mitchell H. Cohen Bldg.  
U.S. Courthouse-4<sup>th</sup> & Cooper Streets.  
Camden, New Jersey 08101

**Re: C.V. v. Carminucci**  
**Civil Docket No.: 2:24-cv-02096-JXN-ESX**

Dear Judge Kiel,

This office represents the Defendant, Lauren Carminucci, in connection with the above-referenced matter. Currently the Plaintiff has filed a Motion for Protective Order, which is currently returnable on April 1, 2024.

This office was just recently retained within the last week. As such, I respectfully request that the Court adjourn the pending motion to April 15, 2024, to allow our office to respond accordingly. My opposition on behalf of the Defendant, Lauren Carminucci, will be due on April 1, 2024, and Plaintiff's Reply, if any, would be due on April 8, 2024.

I thank Your Honor in advance for your attention to this matter.

Respectfully submitted,  
FUSCO & MACALUSO, P.C.  
*/s/ David T. Ercolano, Esquire*  
DAVID T. ERCOLANO

DTE/als  
cc: All Counsel of Record